

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MARILYN LUCEY,	)	Civil Action 04-CV-10800-NG
Plaintiff	)	
v.	)	
	)	
HARTFORD LIFE AND ACCIDENT	)	
INSURANCE COMPANY,	)	
Defendant	)	

**JOINT MOTION TO FURTHER EXTEND FILING OF DISPOSITIVE MOTIONS**

NOW COME Plaintiff Marilyn Lucey and Defendant Hartford Life and Accident Insurance Company to jointly request an extension of time in which to file dispositive motions. In support hereof, the parties state the following.

1. During the month of July 2005, the parties exchanged settlement proposals and are actively engaged in continuing negotiations.
2. The parties are optimistic that resolution may be reached in the next few weeks.
3. Accordingly, the parties request that the date for filing briefs in accordance with the case stated procedure be revised to September 9, 2005.

WHEREFORE the parties jointly request the Court to grant an extension of time in which to file dispositive motions until September 9, 2005.

Respectfully submitted,  
Marilyn Lucey

By her attorneys,



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Hartford Life and Accident Insurance Co.

By its attorneys,

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